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October 12, 2023

VIA ECF

Honorable Frederic Block
United States District Court Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Government Employees Insurance Company, et al. v. Zaitsev, et al.*
Docket No.: 20-cv-03495-FB-SJB

Dear Judge Block:

We represent Plaintiffs ("GEICO" or "Plaintiffs") in connection with the above-referenced matter. Pursuant to Your Honor's Order dated October 5, 2023, we write to inform the Court of, and request the Court to approve, the following briefing schedule for Plaintiffs' motion to exclude the rebuttal testimony of Defendants' expert witness, James Murphy, M.D., to which the parties have agreed:

- Plaintiffs' opening papers shall be served by email on or before December 7, 2023;
- Defendants' opposition shall be served by email on or before January 8, 2024; and
- Plaintiffs' reply, if any, shall be served by email on or before January 22, 2024.

On or before January 22, 2024, Plaintiffs will file the fully briefed motion with the Court via ECF.

In addition, the parties have agreed to, and request that the Court approve, the following briefing schedule for the parties' summary judgment motions, to which the parties have agreed:

- The parties shall serve their respective opening papers by email on or before January 8, 2024;
- The parties shall serve their respective opposition papers on or before March 6, 2023; and
- The parties shall serve their respective reply papers, if any, on or before March 22, 2023.

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On or before March 22, 2023, Plaintiffs will file the fully briefed motions with the Court via ECF.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

RIVKIN RADLER LLP

/s/ Colleen O'Neil

Colleen O'Neil

cc: All counsel via ECF